

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	Chapter 9
	:	
CITY OF CHESTER, PENNSYLVANIA	:	Case No.: 22-13032-amc
	:	
Debtor.	:	
	:	

**PARTIAL JOINDER AND LIMITED OBJECTION
OF THE ELECTED OFFICIALS TO THE
MOTION FOR ENTRY OF AN ORDER (I) APPOINTING A
JUDICIAL MEDIATOR, (II) REFERRING CERTAIN MATTERS TO
MANDATORY MEDIATION, AND (III) GRANTING RELATED RELIEF**

Thaddeus Kirkland, as Mayor of the City of Chester, and the members of city council of the City of Chester (the “Elected Officials”) file this partial joinder and limited objection to the *Motion for Entry of an Order (I) Appointing a Judicial Mediator, (II) Referring Certain Matters to Mandatory Mediation, and (III) Granting Related Relief* (the “Motion”)¹ filed by Michael Doweary (the “Receiver”) on behalf of the debtor, the City of Chester (the “City”):

1. The Elected Officials generally join the request for the appointment of a mediator.
2. However, because the Elected Officials are responsible for the governance of the City and represent the interests of the citizens of the City, the Elected Officials are indispensable parties to any mediation. The Receiver may not unilaterally resolve any of the mediated matters without the participation and likely formal approval by the Elected Officials as required by applicable law.

¹ ECF No. 16.

3. Accordingly, any order approving the Motion should expressly provide the Elected Officials, or their designee, the right to attend and participate in any mediation. Any order approving the Motion should also expressly state that any resolution reached during the mediation is subject to any formal approvals required by applicable law.

Date: November 30, 2022

BUCHANAN INGERSOLL & ROONEY PC

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